HRA of Saint Paul Homeownership Development Program Manual Public Review

Page #	Section	Comment	Staff Response
General General	General General	I didn't see workforce participation/DBE/Sect. 3 goals, but I probably just missed them. Also missed where the DC approval comes in the timeline of project development and award. Once more, hats off to you guys for the development of the master plan and the sharing it with us 8/1. The entire thing seems very well thought out.	The goals for HR/EEO compliance are attached as an appendix, and also update frequently. As a result the specific goals will be shared through a pre-construction compliance training after funding awards are made. Thank you!
		One comment from my 8/1 meeting table regarding the 56 "no strings attached" properties to sell. Andy and Gail mentioned that it is easier to get reduced development standards through plan review than the standards set throughout the rest of this initiative. Though these 56 properties aren't in the cluster areas, allowing developers to build this many homes to a lesser standard is counter to the entire mission. Further, doing so might negatively impact appraisal comps, putting downward pressure on all of the work being done. Perhaps there should be at least some "strings attached." Just a thought.	This is a helpful comment and we'll consider it after the pilot sale of 5 properties this fall/winter.
1	II	It would probably be helpful (and more conventional) if the "Definitions" were alphabetized.	We agree and have made the change.
2	III – C	I would strongly recommend that your Developer Fee not be computed on sales price, but rather on development costs. You openly acknowledge that you may subsidize a unit up to \$150,000	We revised the developer fee to 10% of total development costs, less acquisition.

		over the market value—and total development	
		cost represents the amount of work the	
		Developer would have had to do to bring the	
		property back to the market. I think it is more	
		just to Developers to allow them to be	
		compensated for the work they have had to do.	
		Restricting the fee as this document does will	
		cause Developers to gravitate to the projects	
		where the market is better—perhaps the exact	
		opposite of where you need your best	
		Developers to go!	
5	V – C and D	Is there any process to pre-qualify bidders?	There is not a process to pre-qualify bidders.
		Is a professionally developed Scope of Work	A professionally developed Scope of Work is required,
		presumed/required or is design-build an option?	including elements outlined in Section V.C. As a result design-
			build is not an option.
		Does St. Paul Civil Rights Dept. play any role in	Only to the extent of informing Developers of compliance
		this phase?	requirements. Developers should be aware of Section 3 bidding
		'	preference when making any general contract award.
		Or is all this addressed in Appendix C?	Compliance requirements are outlined in the appendix.
6	V – F	Is there a required form of construction	No there is not.
		contract?	
9	X – B	Exactly when are the buyer eligibility	The buyer eligibility requirements are available when the RFP is
		requirements available?	released. Included in both program manuals are key income
			requirements associated with different funding sources.
			Funding used on each individual project are outlined on the
			property list matrix.
		Is this information available when site availability	
		is published?	Yes, see above.
		Is there a Marketing Plan outline, or	See Section 10.B – simply listing on MLS and hiring a realtor
		requirements for the Marketing Plan published	would not sufficiently meet the affirmative marketing

		somewhere? (In other words, is hiring a realtor and listing on MLS an acceptable Marketing Plan?)	requirements. Section 10.B outlines the requirements of an acceptable marketing plan.
16	ENERGY STAR/Green Communities Note	More info needed	We provided a link to the Green Communities website.
16	Rooms	Should Living Room, Dining Room, etc. also be included in New Construction standard?	We removed this section because we felt it was unnecessary.
16	Bathrooms	As our population ages, stairs become a challenge. Does it matter to us if the full bath is on the first or second floor? Why do we prefer the 2 nd floor?	We removed this section because we felt it was unnecessary.
2	III – A	Demo guidelines have too much latitude in determining what constitutes blight and determining cost reasonableness of rehab.	Staff discussed and felt that the requirement of HRA approval for demolition, combined with a subsidy cap of \$150,000 was a reasonable guideline for determining if demolition is an acceptable outcome. If there are specific policy recommendations to improve our process, please let us know.
2	III – C	Developer fee defined as % of gross sales, attached budget worksheet defines as % TDC. Developers prefer % TDC	We have made this change (see comment above)
9	X – A	Will the phrase "timely manner" soon become more concrete?	Yes, we edited this phrase to say "in accordance with the Timeline"
11	XIV	Anecdotes from low income borrowers who had difficulty finding a mortgage lender willing to provide a loan on a home with resale restrictions, might be worth researching so that we don't inadvertently deny a significant portion of potential buyers	This has not been the HRA's experience to date and the Resale requirement is a condition of NSP funding; as a result it is non-negotiable on NSP properties.
16 - 32	General	Standards reflect too great a step above code minimums and are overly prescriptive. "Public goods," (raingardens, IAQ, etc.) should be directly and completely subsidized rather than getting rolled into how the gap is calculated, etc.	Staff discussed this comment and removed many of the areas from design guidelines that were overly prescriptive/unnecessary. Staff also discussed line by line each design requirement. The remaining items are design guidelines that we feel are important to maintain, because one of our program objectives is to stabilize the real estate market in areas that are adversely impacted by disinvestment and

			foreclosure.
16	All Finished Rooms	Minimum 7' ceiling should be amended to follow the language of the building code ">7' for at least 50% of the finished area". This gives a lot more flexibility in saving 1 1/2 story homes.	We removed this because it is a code requirement.
16	Rooms	Consider requiring "X square feet of common living space for every Y square feet of sleeping rooms," or something along those lines (to accommodate trend toward more open floor plans)	We removed this because it is a code requirement.
16 – 17	Visitability	Does this mean that all of these things are preferred, or only the first and the rest are required? Clarification between preferred and required	We updated the guidelines to more clearly reflect preferences vs. requirements
17	Visitability	The size required for an accessible half bath on the main floor plus the other required rooms and the 22' frontage required by zoning results in a floorplate that drives up total square footage and, as a result, cost – something to consider	Understood, but the visitability requirement is helpful for leveraging funding from MHFA and also an important feature of lifecycle housing.
17	Energy Efficiency	Move text regarding the "HERS audit" to top of requirements, given that it happens first (prior to incorporating specs).	Done.
17	Construction Waste	50% is good, but Green Communities offers points at 35%, 45%, 55%, 65%, and 75%. If we raised our requirement to 55% we would get 3 points in Green Communities, rather than 2 points for 50%. Also, add "diverted from landfills and incinerators. Change "construction debris" to "construction waste."	We removed this requirement as it is covered in the Green Communities standard.
Multiple	Multiple (Lead Mitigation)	First mention of lead control specifies abatement. Later encapsulation methods are outlined. This is confusing. Also, much hand wringing has occurred over scope of work creep that results from abatement (damage to	No change: Encapsulation is a HUD approved form of abatement. Due to the level of public subsidy invested in home rehabs, our team feels it is important to abate all lead hazards in a home in order to ensure it is healthy and safe for the occupant. This is also a requirement when HUD funding has

		adjacent surfaces, removal of plaster and lathe and subsequent wall cavity improvements, etc.) and the loss of contributing architectural elements in the name of hazard mitigation. Not a lot of leeway here on projects with large amounts of federal dollars, but it might be worth looking at in greater detail.	been used on a project, with the exception of homes located in a historic district (these projects may simply stabilize lead, instead of abate it).
18	Radon	Very few builders are treating radon at all, let alone requiring an active system. Until building code catches up with IAQ science, it is worth requiring a passive system with disclosure to buyer of any heightened risk	No change: We are following the best practices recommended by the Minnesota Department of Health in order to mitigate home health hazards. Passive systems are acceptable unless a radon test demonstrates high levels of radon.
19	Basement floor	What would be the alternative to concrete floor? Do we want to require concrete?	Agreed, we are eliminating this statement.
19	City Curb/Apron/Sidewalk	I don't know if you want to add it here, but I've heard Public Works staff suggest that contractors take pictures before work begins to document any preexisting damage, so they do not get charged for it.	We removed this section as we felt it was under the purview of Public Works.
20	Foundation Walls	New Construction requirements provided are not up to current code minimum	We removed this section
20	Foundation Walls	Are we requiring either tuckpointing or parging, or both? I think parging is used instead of tuckpointing/repointing, right? If this is the case, maybe include the word "or."	We clarified by adding "or"
20	Decorative Metal Railings	Do we want to delete the word "Decorative" or provide some more detail about what we are looking for? It looks like we allow wood or concrete stairs, so do we want to delete concrete or specify somehow?	Decorative was removed.
20	Garage	Language discouraging fire rated assemblies seems contradictory with landscaping goals. Smaller garages with less separation from the lot line (by means of a fire rated assembled) should	We agree and removed that language.

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		be encouraged as a way to increase useable	
		green space on small urban lots as a way to	
		encourage healthy lifestyles (gardens, outdoor	
		play) and increase permeable surface for storm	
		water management.	
21	Trim Work	Rehab interior trim: this is an ambiguous	The developer makes the determination. Staff reviewed the
		standard. Who makes the determination on	language and felt that it was clear enough to give a Developer
		quality between repair and replace?	latitude to make a decision.
21	Seal all by-passes	I think they use the term "ENERGY STAR rater"	We made the change.
		for new homes instead of auditor.	
21	Siding	I would strike "replace asbestos siding". Given,	Ok, we made this change.
		it's ugly. But it is durable and if maintained poses	
		no health risk. On the other hand, removal	
		creates friable asbestos around the home and in	
		the landfill, and typically the underlying siding	
		has hazardous lead paint requiring to layers of	
		costly abatement and exposing all sorts of	
		potential sheathing and weather barrier costs.	
		Also, from a preservation standard, asbestos	
		siding left intact preserves the underlying original	
		siding and trim for some point in the future when	
		an owner might would to tackle an exterior	
		restoration project.	
21	Siding	Replace cement board siding to something like	We will research and update accordingly.
		"approved engineered siding product". Many	, , ,
		other manufacturers have introduced	
		competitive products since Hardy entered the	
		market 20 years ago. Many of them do not	
		expose installers to the kinds of respiratory risks	
		that cement board does.	
21	Siding	Do we prefer cement board siding for New	We will research and update accordingly.
		Construction as we do with existing homes, or	.,,
		are alternatives OK?	
22	Gutters	LeafGuard is a brand, other more generic terms	We updated this item to a generic term.
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		are gutter covers, gutter guards, gutter screens, and gutter filters.	
22	Doors	Interior and Exterior the spec is too restrictive. Few builders install solid core doors except in custom homes or as an upgrade. Many older homes have no glazing on the entry doors, and certainly the current glazing options on steel skin doors leave much to be desired in energy performance and appearance.	Our staff discussed and felt this was important to maintain, because it provides site lines from the interior of the home to the exterior as well as provides additional natural light into a home.
22	Exterior Doors	We could require them to be ENERGY STAR if we want to; there is a very large selection.	Green Communities certification is enough in our opinion.
23-24	Flooring	Floorcoverings seem overly prescriptive. What's wrong with vinyl flooring?	We've removed this reference. Vinyl was originally omitted because of bonus points eligible through MN Green Communities.
23-24	Flooring	I'm not sure if Green Seal certifies flooring or not. I think Green Seal would certify the adhesives, not the floor itself. Floorscore only certifies hard surfaces, so let's not reference it for carpet. Also, Green Label Plus is a more suitable standard for carpet. Marmoleum is a brand of linoleum.	We've removed this language.
24	Drywall/Plaster	Like the rehab trim replacement the decision on when to repair and when to replace plaster is unclear and of course has unanticipated consequences for insulation, wiring, trim, etc.	We agree and are allowing Developer's to use latitude when making this decision.
24	ENERGY STAR qualified for New Homes requirement	Needs discussion/clarification	We are providing a training on October 22 nd and an additional training after developers are selected to clarify requirements.
24	Best grade, No VOC paint	Do we want to include a standard like Green Seal?	We discussed and felt the low/No VOC was a sufficient requirement.
25	Wood Finishes	Do we want to include a standard like Green Seal?	We discussed and felt the low/No VOC was a sufficient requirement.
25	Ceramic Tile	There are plenty of serviceable tub surround	We agree and omitted this requirement.

		options other than ceramic. Ceramic may be	
		among the most poorly waterproofed and high	
		maintenance of the options.	
25	Appliances	Strike icemaker from refrigerator components,	We agree and omitted this requirement.
		they are notorious sources of insurance claims.	
25	Appliances	Why stainless? I know some people like stainless but others complain about fingerprints.	We agree and omitted this requirement.
25	Overhead Garage	Really consider why you are requiring a garage	We considered and will retain this requirement. It has been a
	Door Opener	door opener.	selling point for a majority of homeowners in the NSP program.
25	Cabinets	My opinion is that your cabinet requirements	We discussed and felt this was important to maintain. A
		reflect what would be a buy-up option for most	plywood box and dovetail joinery ensure two things: 1) that
		builders. A solid wood face frame on a particle	there is not off-gassing from formaldehyde in the home and 2)
		board box will be serviceable throughout the	that a higher quality product that is less likely to need
		time the city has a stake in the property.	replacement in the near-term is installed. Both of these factors
			contributed to our decision to maintain this requirement.
26	¾ Bath Furnishings	Is the "towel bar" a different size/object than the	We removed this section.
		"towel ring or bar," mentioned before? Do we	
		want to say "hand towel or ring" for the first	
		one? Clarification needed.	
26	Full Bath Furnishings	Same as previous comment.	We removed this section.
26	Exterior Hose Bibb	Wouldn't we want more than one spigot on a	In discussion with developers it was clear that more than one
		new home?	exterior spigot was often unreasonable. As a result we are only
27	Air Conditioning	I would not make central AC a requirement. It is	requiring one. No change: again, this has been a significant selling point.
21	Air Conditioning	seldom needed in this climate and it encourages	Because we are focusing our investment in distressed markets
		people to close up their homes and avoid	we believe it is important to provide features like this.
		interacting with their neighborhoods. However,	we believe it is important to provide reactives like this.
		it is highly valued by buyers and when they have	
		AC installed after construction they are often	
		sold over sized and inefficient equipment.	
28	Solar rough in	Solar rough in is a step too far in my opinion.	Agreed, we removed it.
29	Sod	This requirement contradicts the following two	Agreed, we removed it.
23	30u	requirements and the Landscape Design section	Agreed, we removed it.
		below. It also precludes the option of planting	
		below. It also precidues the option of planting	

		perennials and native plants. This could be reworded to require sod in those places that are not otherwise landscaped.	
29	Sod and Planting	Are these sections necessary in the "Design Standards," or are they adequately reflected in the attached "Landscape Design Guidelines?"	Agreed, we removed it.
31	Capitol Region Watershed District	Do we mean no-cost design (complimentary) or a design that compliments the house/brings it all together (complementary). If we mean the first, let's say "free" or "no cost." If we mean the second, we need to change the spelling.	Agreed, we changed the wording.
32	Small-up to 30'	"Crabapple – limit use" is repeated from above. Maybe strike one of them. I don't know if it belongs under 20' or 30'.	Agreed, we removed one.